

### **REMARKS**

Reconsideration and allowance of the subject application are respectfully requested. Claims 1-19 remain pending, claims 1 and 7 being independent claims. In this Reply, Applicants have amended claims 1, 7, 10, 11, 12, 13 and 14.

### **Prior Art Rejection**

Claims 1-19 stand rejected under 35 U.S.C. § 102 as allegedly being anticipated by U.S. Patent No 5,594,322 to Rozman et al. (hereinafter "Rozman"). This rejection is respectfully traversed.

Independent claim 1 is directed to a starter/generator system for an engine. The starter/generator system of claim 1 comprises: a starter/generator including an exciter stator with a DC winding; and a multi-use controller, for providing AC power to the exciter stator during a start mode of operation and DC power to the exciter stator during a generate mode of operation, such that the multi-use controller operates as an exciter power supply during the start mode and as a generator control unit during the generate mode. The multi-use controller comprises: a power conversion unit for converting input DC power to the AC power provided to the exciter stator during the start mode of operation and converting input DC power to the DC power provided to the exciter stator during the generate mode; and a switching driver for driving switching elements of the power conversion unit based on start control signals received during the start mode and based on generate control signals received during the generate mode.

Therefore, as emphasized by the amendments presented in this Reply, the starter/generator system of claim 1 utilizes a multi-use controller having a particular arrangement for operating as an exciter power supply during a start mode of operation and as a generator control unit during a generate mode of operation.

As discussed in the Reply dated June 22, 2005, Rozman discloses a brushless, synchronous generator system 10 that includes: a generator 12; a voltage regulator 40; and a power conversion system 54. Fig. 1; col. 5, lines 37-66. During a generating mode of operation, the voltage regulator 40 provides DC power to a field winding 28 disposed in a stator 26 of the generator 10. In a start mode of operation, an exciter power converter 76 of the power conversion

system 54 provides AC power to the exciter field winding 28. Therefore, the starter/generator system of Rozman clearly utilizes separate generator control (voltage regulator 40) and exciter power supply (exciter power converter 76).

In maintaining the rejection under 35 U.S.C. § 102, page 2 of the Office Action asserts that the asserted differences between the system of claim 1 and that of Rozman relate to “intended use” and do not relate structural characteristics of the claimed multi-use controller that distinguish from the arrangement of Rozman.

Initially, Applicants respectfully submit that the features of the claimed multi-use controller emphasized to distinguish over Rozman do not merely relate to an intended field of use, and instead define functional characteristics of the controller. These aspects of the claimed multi-use controller define a controller that is neither taught nor inherent in Rozman. In an effort to expedite prosecution, Applicants have amended independent claim 1 to emphasize aspects of the multi-use controller that define its arrangement, thereby further distinguishing over the applied prior art. More specifically, Rozman fails to disclose or suggest a multi-use controller having a power conversion unit and switching driver arrangement as now recited in claim 1.

Regarding the assertion on page 3 of the Office Action that the multi-use controller merely involves “putting together or integrating” prior art components, Applicants respectfully disagree that this reasoning establishes anticipation, and note that this reasoning appears to relate to questions of obviousness, not anticipation.

According to MPEP § 2131, “a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051 (Fed. Cir. 1987). “The identical invention must be shown in as complete detail as is contained in the ... claims.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913 (Fed. Cir. 1989).

At least in view of the above, Applicants respectfully submit that Rozman fails to anticipate claim 1 or any claim depending therefrom. Furthermore, Applicants respectfully submit that claim 7 and claims depending therefrom define over Rozman based on similar reasoning to that set forth above with regard to claim 1.

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In view of the above, Applicants respectfully request reconsideration and withdrawal of the Examiner's rejection under 35 U.S.C. § 102.

### **Conclusion**

Applicants respectfully request that the Examiner enter the amendments presented herein, which are now believed to clearly place the claims in condition for allowance.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact the undersigned at the telephone number below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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